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MEMORANDUM

SUBJECT: Draft EPI/PA for Eagle Signal Company, Davenport, IA

FROM: Jeff Johnson
RCRA/GEOL

TO: Ken Herstowski
RCRA/IOWA

The draft EPI/PA report for Eagle Signal Company, Davenport, Iowa, has been reviewed, as requested. In general, the report appears adequate; however, the following specific comments are offered. Comments are keyed to the pertinent sections.

Section 3.3 Climate, Soil and Hydrogeology

1. Direction of groundwater flow within the bedrock aquifer (Middle Devonian Wapsipinicon Formation) should be indicated, at least on a regional scale if local information is unavailable.

Section 4.0 Visual Site Inspection (VSI)

1. Many of the SWMUs discussed in this section are situated above concrete floors. The integrity of these floors, however, is rarely discussed. Inspection for floor cracks around SWMUs that handle large quantities of liquid waste is especially important. Such SWMUs at this site include SWMUs 1, 2, 5 - 11, and 13. Some indication should be given in the description of these SWMUs on the general integrity of the concrete floor, whether or not the floor was inspected for cracks and, if so, whether or not distinct cracks were evident.

A final comment regards the absence of conclusions or recommendations within my copy of this draft report. Specific recommendations should be provided for those SWMUs/AOCs judged to require further characterization. If no further work is deemed necessary in SWMU characterization, it should be so stated.

If you have any questions regarding these comments, I can be reached at extension 7849.

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